

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Richland Moulded Brick - Removal Polrep
Initial Removal Polrep

US EPA RECORDS CENTER REGION 5



457002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial Progress Report -- PRP lead removal action
Richland Moulded Brick

Mansfield, OH
Latitude: 40.8292410 Longitude: -82.4953318

To: Mark Johnson, ATSDR
Valencia Darby, Department of Interior
Kevin Clouse, Ohio EPA
Scott Shane, Ohio EPA
Lindy Nelson, U.S. DOI
Sam Borries, U.S. EPA
Yolanda Bouchee-Cureton, U.S. EPA
Mark Durno, U.S. EPA
Jason El-Zein, U.S. EPA
Sherry Fielding, U.S. EPA
John Glover, U.S. EPA
Thomas Marks, U.S. EPA
Carol Ropski, U.S. EPA

From: Stephen Wolfe, On-Scene Coordinator

Date: 11/18/2013

Reporting Period: 09/25/2013 through 11/15/2013

1. Introduction

1.1 Background

Site Number:	C5E5	Contract Number:	
D.O. Number:		Action Memo Date:	7/22/2013
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/15/2013	Start Date:	10/15/2013
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510798	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA incident category: Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Site is located at 775 to 1000 Richland Shale Road, Mansfield, Richland County, Ohio, 44905. The geographical coordinates for the Site are 40° 49' 51" North latitude and -82° 29' 28" West longitude. The Site where the release occurred is located in a rural area.

The Site is approximately 500 acres in size (combined from the two addresses) with various buildings located on the property for brick manufacturing. Fencing is present along the frontage of the properties; however there are multiple access points to the site despite the fence. The Site is situated in a rural area, and Richland Shale Road borders the site to the south. The Site is surrounded by open land/farmland and the nearest residential property is approximately 0.3 miles from the hazardous materials located on site.

1.1.2.2 Description of Threat

Hazardous waste present at the site includes (but is not limited to): barium, cadmium, lead, mercury, and selenium. All wastes on site are stored in an uncontrolled manner, and although fencing is present along the frontage of the property, there are numerous access points for trespass.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On April 17, 2012, EPA and the Superfund Technical Assessment and Response Team contractor conducted a site assessment to determine the presence of hazardous substances abandoned material on site. Approximately 100 drums and numerous smaller containers with unknown contents, and piles of solid material were documented on site. Sampling results indicated that

heavy metals (barium, cadmium, lead, mercury, and selenium) were present in some of the drums and piles of material that exceeded the toxicity characteristic leaching procedure (TCLP) limits.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The following activities have been conducted at the site by the PRP's contractor to date (beginning October 15th, 2013):

- All work plans, Health and Safety Plans, and Contractor information was submitted to U.S. EPA for approval. U.S. EPA approved all plans and contractors prior to initiation of any on-site activities.

- An asbestos survey was completed on the property in order to identify any friable asbestos or any asbestos containing material (ACM) that is no longer part of the building structure.

- All loose friable ACM has been containerized for disposal. During the cleanup of broken transite panels outside of Plant 1, a trench was discovered (approximately 8 ft by 2 ft by 100 ft) that contained broken transite panels (ACM). The panels were removed for disposal. Approximately 60 cubic yards of ACM has been prepared for disposal.

- The entire property was inspected to locate any containers that were dumped on the property. All containers were recovered and staged at either Plant 1 or Plant 2 for characterization and disposal.

- Approximately 70 percent of the abandoned waste has been sampled for disposal characterization.

- Approximately 500 tons of petroleum contaminated soil (non-hazardous) was shipped off site for disposal.

- Approximately 100 tons of non-hazardous solid wastes (frit, clay ball, limestone, sand, etc) was shipped off site for disposal.

- Several small transformers were discovered that vandals had accessed for scrap copper. The transformers were wrapped in plastic and staged for removal. Samples were collected to determine if the transformers contained PCB oil (wipe samples or soil samples).

- Small containers were consolidated and staged for disposal characterization.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ohio EPA issued several Notices of Violation and Director's Final Findings and Orders to the RMB company and the new property owner Richland Shale Road Rail Depot. Both companies are in non-compliance with Ohio EPA's Orders.

U.S. EPA identified four PRPs and sent notification letters to all parties. RMB signed an Administrative Order on Consent with U.S. EPA on September 25, 2013 to perform the removal activities.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned for the PRP removal action:

Develop and implement a Site Health and Safety Plan and Work Plan;

Characterize and dispose of all hazardous substances, materials, pollutants, or contaminants located at the facility; and

Remove waste oil from containers and machine pits/trenches.

2.2.1.2 Next Steps

Complete characterization of all wastes and remove wastes from site

2.2.2 Issues

The volume of buried asbestos encountered required a 14-day notification to Ohio EPA for asbestos removal and would have delayed the project; however, Ohio EPA gave permission to the PRP contractor to remove the material without a formal 14-day notification process.

The property owner granted permission to local hunters to hunt on the property, impacting the safety of on-site personnel. Hunting activities were banned while the entire property was being inspected for abandoned waste and all hunting activities are banned until the removal action is complete within 200 yards of the buildings.

Once required activities under the U.S. EPA orders are complete, the PRPs will still need to meet requirements of the Ohio EPA's Director's Final Findings and Orders.

Inclement weather may delay the removal actions.

2.3 Logistics Section

The PRP's contractor is providing all logistics for the site

2.4 Finance Section

2.4.1 Narrative

A payment (\$67,534.88) was made by the PRP (The RMB Company) for past response costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
TAT/START	\$40,000.00	\$39,000.00	\$1,000.00	2.50%
Intramural Costs				
USEPA - Direct	\$40,000.00	\$20,000.00	\$20,000.00	50.00%
USEPA - InDirect	\$40,000.00	\$32,894.42	\$7,105.58	17.76%
Total Site Costs	\$120,000.00	\$91,894.42	\$28,105.58	23.42%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Daily Safety meetings are held with on-site personnel prior to the start of each days activities.

Brightly colored clothing (safety vests) are to be worn at all times due to hunting activities

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

No information available at this time.

4. Personnel On Site

PRP Contractors: 4-6

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.